

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA )  
v. )  
BRUCE W. SPINNEY, III )  
Defendant. )  
Case No. 24-cr-40016-MRG

## FINAL STATUS REPORT

The United States respectfully submits the following status report regarding the above captioned case pursuant to Local Rules 116.5(c) for the final status conference scheduled for December 18, 2024, at 9:30 a.m.

## **Rule 116.5(c) Issues**

Concerning the issues in Local Rule 116.5(c), the government submits the following:

1. At this point, it is likely but not certain that the defendant will proceed to trial.
2. The defendant and the government request a pre-trial hearing before the U.S.

District Court Judge for the purpose of scheduling a trial date, deadlines for the filing pre-trial motions and other pre-trial deadlines.

3. The parties further state:
  - a. The government represents that it has completed automatic discovery under LR 116.1(c)(1)
  - b. There are also currently no outstanding discovery disputes. The defendant reserves the right to make additional discovery requests as needed.
  - c. While the government has made a complete disclosure of all Jencks material, any other potential remaining *Jencks* material will be disclosed 30 days before

the actual trial date. The government will make any additional disclosures, if necessary, pursuant to LR 116.1(c)(2), 21 days before the actual trial date.

- d. The defendant is considering and may file a motion to suppress.
- e. The Court should exclude the time from the final status conference, December 1, 2024, until the date of the first pre-trial conference before the district court judge.
- f. If the case proceeds to trial, the parties anticipate that the case will take approximately one-week.

Undersigned counsel has shared a copy of this status report with counsel of record for the defendant who joins in the request in this status report.

Respectfully submitted,

JOSHUA S. LEVY  
United States Attorney

By: /s/ Neil Gallagher  
Neil J. Gallagher, Jr.  
Assistant U.S. Attorney

Date Submitted: December 16, 2024

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Neil J. Gallagher, Jr.  
Neil J. Gallagher, Jr.